

KAEMPFER CROWELL
Robert McCoy, No. 9121
Sihomara L. Graves, No. 13239
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Telephone: (702) 792-7000
Facsimile: (702) 796-7181
Email: rmccoy@kcnvlaw.com
Email: sgraves@kcnvlaw.com

STEPTOE LLP
Stephen J. Newman (*pro hac vice*)
Alice Kwak (*pro hac vice*)
2029 Century Park East, 18th Floor
Los Angeles, California 90067
Telephone: (310) 556-5800
Facsimile: (310) 556-5959
Email: snewman@steptoe.com
Email: akwak@steptoe.com

Attorneys for Defendant American
Express National Bank

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JENNAFER AYCOCK,

Plaintiff,

vs.

AMERICAN EXPRESS NATIONAL
BANK; and EXPERIAN
INFORMATION SOLUTIONS, INC.,

Defendants.

Case No. 2:23-cv-00292-CDS-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
AMERICAN EXPRESS NATIONAL
BANK TO RESPOND
(FIRST REQUEST)**

Plaintiff Jennafer Aycock (“Plaintiff”) and defendant American
Express National Bank (“American Express”) (collectively the “Parties”) stipulate
to extend time for American Express to respond to Plaintiff’s Motion to Compel

1 Discovery Responses and Supplemental Disclosures and Request for Sanctions
2 (ECF No. 52) (the “Motion”), and in support thereof state as follows:

3 1. On October 17, 2024, Plaintiff filed the Motion.

4 2. American Express’s deadline to respond to the Motion is
5 currently October 31, 2024.

6 3. Plaintiff’s reply in support of the Motion is currently due
7 November 7, 2024.

8 4. The Parties have agreed to extend the time for American
9 Express to respond to the Motion by 11 days, up to and including November 11,
10 2024, with a reciprocal extension of 7 days for Plaintiff to file a reply brief, up to
11 and including November 25, 2024.

12 5. Good cause exists for granting this extension because the
13 parties require additional time to facilitate resolution of this matter and resolve
14 certain discovery disputes to conserve judicial resources.

15 6. This extension is sought in good faith and not for the purpose of
16 delay.

17 THEREFORE, IT IS HEREBY STIPULATED that the time for
18 American Express to respond to the Motion be extended by 11 days, up to and
19 including November 11, 2024, with a reciprocal extension of 7 days to
20
21
22
23
24

1 the deadline for Plaintiff to file a Reply Brief, up to and including November 25,
2 2024.

3 KAZEROUNI LAW GROUP, APC

KAEMPFER CROWELL

4 /s/ Gustavo Ponce

5 Gustavo Ponce, No. 15084
6 Mona Amini, No. 15381
6940 South Cimarron Road, Suite 210
Las Vegas, Nevada 89113

7 Attorneys for Plaintiff
8 Jennafer Aycock



Robert McCoy, No. 9121
Sihomara L. Graves, No. 13239
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135

STEPTOE LLP
Stephen J. Newman (*pro hac vice*)
Alice Kwak (*pro hac vice*)
2029 Century Park East, 18th Floor
Los Angeles, California 90067

Attorneys for Defendant American
Express National Bank

13 **ORDER**

14 IT IS SO ORDERED.

15 
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: November 1, 2024